

TSD File Inventory Index

Date: November 17, 2008

Initial: CM [Signature]

Facility Name: <u>Agri-Tech Corporation</u>		
Facility Identification Number: <u>040 004 179 453</u>		
A.1 General Correspondence		B.2 Permit Docket (B.1.2)
A.2 Part A / Interim Status <u>A-2</u>	1	.1 Correspondence
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.4 Financial Insurance (Sudden, Non Sudden)	X	.1 Land Disposal Restriction Notifications
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A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment
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A.5 Ambient Air Monitoring		.1 RFI Correspondence
.1 Correspondence		.2 RFI Workplan
.2 Reports		.3 RFI Program Reports and Oversight
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Total - 5

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.6 RFI QAPP Correspondence		.7 Lab Data, Soil-Sampling/Groundwater	
.7 Lab Data, Soil-Sampling/Groundwater		.8 Progress Reports	
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D.3 Corrective Action/Remediation Study		E. Boilers and Industrial Furnaces (BIF)	
.1 CMS Correspondence		.1 Correspondence	
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.3 CMS Workplan		F.1 Imagery/Special Studies (Videos, Photos, Disks, Maps, Blueprints, Drawings, and Other Not Oversized Special Materials.)	
.4 CMS Draft/Final Report		G.1 Risk Assessment	
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.6 CMS Progress Reports		.2 Compliance and Enforcement ...	
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.4 CMI Draft/Final Reports		.8 Endangered Species Act	
.5 CMI QAPP		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: _____

TRW Inc.

Executive Offices
1900 Richmond Road
Cleveland, OH 44124

TRW

Jean

RECEIVED
AUG 10 1990
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

July 13, 1990

Ms. Sally K. Swanson, Chief
IN / MN / OH Enforcement Program Section
United States Environmental Protection Agency
230 South Dearborn St.
Chicago, Illinois 60604

Re: Notice of Violation
TRW Inc.
OHD004179453

Dear Ms. Swanson:

Your letter dated June 25, 1990, was received by my office on July 3, 1990. The referenced Resource Conservation and Recovery Act (RCRA) inspection by the Ohio Environmental Protection Agency (OEPA) on September 5, 1989, was conducted at a former TRW Inc. facility located at 23555 Euclid Avenue in Euclid, Ohio. TRW Inc. has not conducted manufacturing operations at this facility since the sale of the property to Argo Tech Corporation on October 20, 1986. Hazardous waste (F-waste) from closure activities at this former TRW Inc. site is generated on an infrequent basis.

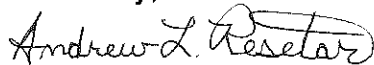
An example of the notification that TRW Inc. is presently supplying to the receiver of F-waste is enclosed per your request. Notifications such as the enclosed example will be used in the future to assure compliance and will be kept on file for five years as required. The file is located at the 1900 Richmond Road, Cleveland, Ohio facility since the 23555 Euclid Avenue facility is no longer owned by TRW Inc.

TRW Inc. has requested from the receiver of the waste, a copy of all notifications sent pursuant to Part 268.7, for all applicable restricted waste shipments. Said documents shall be kept in the aforementioned file.

Notice of Violation
A.L. Resetar
July 13, 1990
Page 2

Please contact me at 216-291-7839 if you have any questions regarding the above.

Sincerely,

A handwritten signature in cursive script that reads "Andrew L. Resetar". The signature is written in dark ink and is positioned above the printed name.

Andrew L. Resetar
Environmental Manager

Enclosure

cc: P. Anderson, OEPA, Twinsburg, Ohio
R.S. Ottinger
F.D. Trickey

NOTIFICATION OF TREATMENT AND PROHIBITIONS FOR LAND DISPOSAL RESTRICTED WASTE STREAMS

OCT 5 1989

Manifest Number: 01213

WPS Number: 35026
Shipper Number: 18039

This serves as notification to Ross Incineration Services, Inc., Grafton, Ohio that the above referenced waste stream is affected by the U.S. EPA Land Disposal Restrictions set forth in CFR Part 268. The following indicated substances and treatment standards are those applicable to this waste stream.

- () Waste analysis data is attached (☒) Waste analysis data has been previously submitted
() Based on knowledge of the waste. and is incorporated by reference.

GENERATOR INFORMATION

Signed on behalf of TRW, Inc. Printed Name Michael J. Lyden
Date 9/28/89 Title Engineering Science

Generator Address: TRW INCORPORATED U.S. EPA ID# 0HD004179453
1900 RICHMOND ROAD
23555 EUCLID AVENUE
CLEVELAND
44117- OH

TREATMENT STANDARDS FOR SPENT SOLVENT WASTES.
U.S. EPA Hazardous Waste Code(s) F001

F001-F005			F001-F005		
Waste Waters	All Other		Waste Waters	All Other	
Containing	Spent Solvents		Containing	Spent Solvent	
Spent Solvents	Waste		Spent Solvents	Waste	
Spent Solv.	C O N C E N T R A T I O N	mg/L	Spent Solvents	C O N C E N T R A T I O N	mg/L
Acetone	0.05	0.59	Methylene Chloride	.44 %	
n-Butyl Alcohol	5.0	5.0	(from the Pharmaceu-		
Carbon Disulfide	1.05	4.81	tical industry)		
Carbon Tetrachloride	0.05	0.96	Methyl Ethyl Ketone	0.05	0.75
Chlorobenzene	0.15	0.05	Methyl Isobutyl Ketone	0.05	0.33
Cresols (and Cre-	2.82	0.75	Nitrobenzene	0.66	0.125
sylic acid)			Pyridine	1.12	0.33
Cyclohexanone	0.125	0.75	<input checked="" type="checkbox"/> Tetrachloroethylene	0.079	0.05
<input checked="" type="checkbox"/> 1,2-Dichlorobenzene	0.65	0.125	<input checked="" type="checkbox"/> Toluene	1.12	0.33
Ethylacetate	0.05	0.75	<input checked="" type="checkbox"/> 1,1,1-Trichloroethane	1.85	0.41
<input checked="" type="checkbox"/> Ethyl Benzene	0.05	0.053	<input checked="" type="checkbox"/> 1,1,2-Trichloro	1.85	0.96
Ethyl Ether	0.05	0.75	-1,2,2-Trifluoroethane		
Isobutanol	5.0	5.0	<input checked="" type="checkbox"/> Trichloroethylene	0.062	0.091
Methanol	0.25	0.75	<input checked="" type="checkbox"/> Trichlorofluoromethane	0.05	0.96
Methylene Chloride	0.20	0.96	<input checked="" type="checkbox"/> Xylene	0.05	0.15

* Treatment Standard based on concentration waste water, not TCLP Extract. Only waste water treatment standards have been established for this waste category.

Ross Incineration Services, Inc.
4/11/89

AUG 20 1990

5HR-12

Mr. Andrew L. Resetar
TRW, Inc.
1900 Richmond Road
Cleveland, Ohio 44124

Re: Return to Compliance
TRW, Inc.
OHD 004 179 453

Dear Mr. Resetar:

We have received and reviewed your letter of July 13, 1990, regarding our Notice of Violation (NOV) dated June 25, 1990.

The information submitted with your letter appears to meet the requirements of the land disposal restriction regulation found at 40 CFR 268. We have, therefore, returned this facility to compliance for those violations cited in our NOV.

If you should have any further questions, please contact Jean Gromnicki of my staff at (312) 886-4555.

Sincerely yours,

Sally K. Swanson, Chief
IN/MN/OH Enforcement Program Section

cc: Mike Savage, OEPA
Paul Anderson, NEDO

bcc: Sally Swanson, REB

5HR-12 gromnicki.walker 6-8093 diskette #4 filename: andrew.res

8/17/90

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	8.10.90	ab for S/KS 8-20-90	

JUN 25 1990

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Andy Resetar
TRW, Inc.
1900 Richmond Road
Cleveland, Ohio 44117

Re: Notice of Violation
TRW, Inc.
OHD 004 179 453

Dear Mr. Resetar:

On September 5, 1989, the Ohio Environmental Protection Agency (OEPA), representing the United States Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above referenced facility. The purpose of the inspection was to determine the compliance status of this facility with respect to the applicable hazardous waste management requirements of Chapter 3734 of the Ohio Revised Code, and also the land disposal restriction regulations as set forth in 40 CFR Part 268 and in revisions to 40 CFR Parts 260-265, 268, 270, and 271.

As a result of the inspection, we have determined that the requirements of the land disposal restriction regulations are being violated.

The facility's records did not contain copies of restricted waste notifications sent with each restricted waste shipment. Under 40 CFR Part 268.7(a)(6), the facility must retain on-site a copy of all notifications produced pursuant to Part 268.7, for at least five (5) years from the date that the waste was last sent off-site. The facility is responsible for obtaining from the receiver of the waste a copy of all notifications sent pursuant to Part 268.7, for all applicable restricted waste shipments. These notifications and all subsequent ones must be kept on file at the generating facility. Please include in your response to this NOV, an example of the notification you are supplying to the receiver of the waste and will keep on file at your facility.

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violation has been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further enforcement action.

-2-

If you have any questions regarding this correspondence, please contact Jean Gromnicki of my staff at (312) 886-4555.

Sincerely yours,

Sally K. Swanson, Chief
IN/MN/OH Enforcement Program Section

Enclosure

cc: Mike Savage, OEPA
Paul Anderson, NEDO

bcc: Sally K. Swanson, REB

5HR-12 gromnicki.walker 6-8093 diskette #3 filename: andy.res

6-18-90

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	6-19-90	6-22-90	



State of Ohio Environmental Protection Agency

Northwest District Office

1035 Devlac Grove Drive
Bowling Green, Ohio 43402-4598
(419) 352-8461 FAX (419) 352-8468

Richard F. Celeste
Governor

Re: Richland County
DSL Corporation
OHD 981197007
Hazardous Waste

April 10, 1990

CERTIFIED MAIL

Mr. Jim Veach
James F. Veach Oil Service
475 East Schreyer Place
Columbus, Ohio 43214

Dear Mr. Veach:

On December 20, 1989, James F. Veach Oil Service accepted one drum of hazardous waste--stoddard solvent-D001--from DSL Corporation, 25 Rupp Road, Mansfield, Ohio. The hazardous waste--stoddard solvent-D001--was pumped into a tanker truck filled with waste transmission fluid and oil for sale to Eastern Petroleum in Georgia. The required waste analysis, EP toxicity for metals and solvent scan for the drum marked "old solvent" was not performed prior to transportation and disposal.

Section 3734.02(F) of the Ohio Revised Code states in part that "No person shall store, treat, or dispose of hazardous waste identified or listed under this chapter and rules adopted under it, regardless of whether generated on or off the premises where the waste is stored, treated, or disposed of, or transporter or cause to be transported any hazardous waste identified or listed under this chapter and rules adopted under it to any other premises, except at or to any of the following: (1) A hazardous waste facility operating under a permit issued in accordance with this chapter; (2) A facility in another state operating under a license or permit issued in accordance with the "Resource Conservation and Recovery Act of 1976", 90 Stat. 2806, 42 U.S.C. 6921, as amended..." Therefore, James F. Veach Oil Service must demonstrate that it has not illegally disposed of this hazardous waste stoddard solvent. In order to accomplish this, you must submit a copy of a manifest or other suitable record documenting the final disposition of the hazardous waste stoddard solvent within ten days. The record must identify the name, address, telephone number, U.S. EPA I.D. number, and hazardous waste permit number for the facility that the waste was shipped to.

Mr. Jim Veach
April 10, 1990
Page Two

The following additional violations of Ohio hazardous waste rules are noted:

1. ⁶³⁻OAC 3745-52-11

James F. Veach Oil Service did not file annually an application for identification designation for each vehicle. On April 3, 1990, the PUCO identified James F. Veach Oil Service as an inactive hauler meaning the proper registration had not been accomplished.

2. OAC 3745-53-20

James F. Veach Oil Service accepted one drum of hazardous waste--stoddard solvent-D001--from DSL Corporation, 25 Rupp Road, Mansfield, Ohio, without a manifest signed in accordance with the provisions of Rule 3745-52-20 of the Administrative code. Furthermore, James F. Veach did not sign and date a manifest acknowledging acceptance of the hazardous waste from the generator and did not return a signed copy of the manifest to the generator before leaving the generator's property in violation of paragraph B; did not ensure that the manifest accompanied the hazardous waste in violation of paragraph C; did not store the manifest on the driver's side of the vehicle in violation of paragraph C; did not obtain the date of delivery and the handwritten signature of the second transporter (rail) and did not retain a copy of the manifest in violation of paragraph D.

3. OAC 3745-53-22

James F. Veach Oil Service has not maintained and kept a copy of a manifest that should have accompanied the transportation of hazardous waste--stoddard solvent-D001--from DSL Corporation.

You are advised that failure to comply with applicable hazardous waste rules may be cause for enforcement action by this Agency pursuant to Chapter 3734. of the Ohio Revised Code.

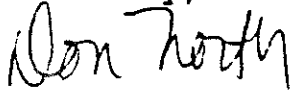
You must respond, in writing, to this Notice of Violation (NOV) within ten days. Your response must include all actions and timetables necessary to achieve compliance with Ohio's hazardous waste rules.

Mr. Jim Veach
April 10, 1990
Page Three

Failure to list specific deficiencies in this NOV does not relieve you from the responsibility of complying with all applicable regulations.

If you have any questions, please contact me immediately.

Sincerely,



Donald F. North
Division of Solid and
Hazardous Waste Management

/jlm

cc: Mike Savage, DSHWM, CO
Janet Leite, DSHWM, NWDO
Bill Palmer, SIU, CO
Pat O'Rourke, AGO, BCI
Dan Fisher, PUCO
Chris Hartford, CDO
Lane Bryant, Eastern Petroleum
A&C Representative
file



State of Ohio Environmental Protection Agency

Northeast District Office

2110 E. Aurora Road
Twinsburg, Ohio 44087
(216) 425-9171

Richard F. Celeste
Governor

September 6, 1989

RE: TRW-TAPCO
OHD 004 179 453
#02-18-0653
CUYAHOGA COUNTY
TSD-F

RECEIVED
OHIO EPA

SEP 11 1989

Andy Resetar
TRW, Inc.
1900 Richmond Rd.
Cleveland, Ohio 44117

DIV. of SOLID & HAZ. WASTE MGT.

Dear Mr. Resetar,

On September 5, 1989, I conducted a hazardous waste inspection at the former TRW-TAPCO facility, 23555 Euclid Ave., Cleveland. You represented the facility during the inspection.

No violations of Ohio's hazardous waste rules were noted during the inspection.

During the inspection, a RCRA Land Disposal Restriction Inspection checksheet was also completed. This form will be forwarded to US EPA for their review and follow-up. I have enclosed copies of both of my inspection-checksheets for your use.

If you should have any questions regarding this matter, please contact me.

Sincerely,

Paul Anderson
Environmental Scientist
Division of Solid and Hazardous Waste
Management

PA.ko

enclosures

cc: Debby Berg, DSHWM, NEDO
Carolyn Reiersen, DSHWM, CO ✓

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: TRW-TAPCO (Aircraft Component Group)

U.S. EPA I.D. No.: OH0 004 172 453

Street: 23555 Euclid Ave

City: Cleveland State: Ohio Zip Code: 44117

Telephone: _____

Operator: TRW

Street: 1900 Richmond Rd

City: Cleveland State: Ohio Zip Code: 44124

Telephone: (216) 291-7839

Owner: TRW

Street: 1900 Richmond Rd

City: Cleveland State: Ohio Zip Code: _____

Telephone: (216) 7339

Inspection Date: 9-5-88 Time: 9:30 Weather Conditions: _____

Name	Affiliation	Telephone
Inspectors: <u>Paul Anderson</u>	<u>Ohio EPA</u>	<u>(216) 725-9171</u>

Facility Representatives: Andy Resner (216) 291-7839

	RCRA Status	F-Solvent	LDR Status California List	First Third
Cond. Exempt SQG Generator	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Transporter				
Treater				
Storer				
Disposer				

Note:
Correspondence
should be
sent to
Andy Resner
at this address

INSPECTION SUMMARY

The TAPCO facility was operated by TRW in the production of aircraft and other weapons-related components. The site was sold to Argo Tech in 1986, and has been inactive (from TRW's point of view) since that time. Argo Tech has leased several portions of the facility to other firms and operates many of the areas themselves. All companies on the site are generator only (no permitted units). TRW was an interim status facility and is currently undergoing closure (final approval - August 1989) for two drum storage areas and a spill area from the testing of torpedoes and associated underground tanks.

At the time of the inspection, there were no wastes (TRW's) on-site. Waste is currently generated only infrequently from the decontamination of monitoring equipment.

RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	<u>F-Solvent Wastes</u>					
1.	F001	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	F002	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	F003	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	F004	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.	F005	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

- Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cadmium	100 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chromium VI	500 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lead	500 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mercury	20 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Nickel	134 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Selenium	100 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Thallium	130 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm	_____	_____	_____	_____	_____
--------	-------	-------	-------	-------	-------

500 ppm	_____	_____	_____	_____	_____
---------	-------	-------	-------	-------	-------

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

_____ Yes _____ No _____ NA

If yes, state reasons for mixing:

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes

- Note: (1) The detailed description for waste codes are listed in Appendix C.
 (2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*	_____	_____	_____	_____	_____
F007	_____	_____	_____	_____	_____
F008	_____	_____	_____	_____	_____
F009	_____	_____	_____	_____	_____
F019	_____	_____	_____	_____	_____
K001*	_____	_____	_____	_____	_____
K004*	_____	_____	_____	_____	_____
K008*	_____	_____	_____	_____	_____
K011	_____	_____	_____	_____	_____
K013	_____	_____	_____	_____	_____
K014	_____	_____	_____	_____	_____
K015*	_____	_____	_____	_____	_____
K016*	_____	_____	_____	_____	_____
K017	_____	_____	_____	_____	_____
K018*	_____	_____	_____	_____	_____
K019*	_____	_____	_____	_____	_____
K020*	_____	_____	_____	_____	_____
K021*	_____	_____	_____	_____	_____
K022*	_____	_____	_____	_____	_____
K024*	_____	_____	_____	_____	_____
K025*	_____	_____	_____	_____	_____
K030*	_____	_____	_____	_____	_____
K031	_____	_____	_____	_____	_____
K035	_____	_____	_____	_____	_____
K036*	_____	_____	_____	_____	_____
K037*	_____	_____	_____	_____	_____
K044*	_____	_____	_____	_____	_____
K045*	_____	_____	_____	_____	_____
K046*	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
K047°	_____	_____	_____	_____	_____
K048°	_____	_____	_____	_____	_____
K049°	_____	_____	_____	_____	_____
K050°	_____	_____	_____	_____	_____
K051°	_____	_____	_____	_____	_____
K052°	_____	_____	_____	_____	_____
K060°	_____	_____	_____	_____	_____
K061°	_____	_____	_____	_____	_____
K062°	_____	_____	_____	_____	_____
K069°	_____	_____	_____	_____	_____
K071°	_____	_____	_____	_____	_____
K073°	_____	_____	_____	_____	_____
K083°	_____	_____	_____	_____	_____
K084	_____	_____	_____	_____	_____
K085	_____	_____	_____	_____	_____
K086°	_____	_____	_____	_____	_____
K087°	_____	_____	_____	_____	_____
K099°	_____	_____	_____	_____	_____
K100°	_____	_____	_____	_____	_____
K101°	_____	_____	_____	_____	_____
K102°	_____	_____	_____	_____	_____
K103°	_____	_____	_____	_____	_____
K104°	_____	_____	_____	_____	_____
K106°	_____	_____	_____	_____	_____
P001	_____	_____	_____	_____	_____
P004	_____	_____	_____	_____	_____
P005	_____	_____	_____	_____	_____
P010	_____	_____	_____	_____	_____
P011	_____	_____	_____	_____	_____
P012	_____	_____	_____	_____	_____
P015	_____	_____	_____	_____	_____
P016	_____	_____	_____	_____	_____
P018	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disc.	Trans.
P020	_____	_____	_____	_____	_____
P030	_____	_____	_____	_____	_____
P036	_____	_____	_____	_____	_____
P037	_____	_____	_____	_____	_____
P039	_____	_____	_____	_____	_____
P041	_____	_____	_____	_____	_____
P048	_____	_____	_____	_____	_____
P050	_____	_____	_____	_____	_____
P053	_____	_____	_____	_____	_____
P059	_____	_____	_____	_____	_____
P063	_____	_____	_____	_____	_____
P068	_____	_____	_____	_____	_____
P069	_____	_____	_____	_____	_____
P070	_____	_____	_____	_____	_____
P071	_____	_____	_____	_____	_____
P081	_____	_____	_____	_____	_____
P082	_____	_____	_____	_____	_____
P084	_____	_____	_____	_____	_____
P087	_____	_____	_____	_____	_____
P089	_____	_____	_____	_____	_____
P092	_____	_____	_____	_____	_____
P094	_____	_____	_____	_____	_____
P097	_____	_____	_____	_____	_____
P102	_____	_____	_____	_____	_____
P105	_____	_____	_____	_____	_____
P108	_____	_____	_____	_____	_____
P110	_____	_____	_____	_____	_____
P115	_____	_____	_____	_____	_____
P120	_____	_____	_____	_____	_____
P122	_____	_____	_____	_____	_____
P123	_____	_____	_____	_____	_____
U007	_____	_____	_____	_____	_____
U009	_____	_____	_____	_____	_____

	Gen.	Treat	Store	Disc.	Trans.
U010	_____	_____	_____	_____	_____
U012	_____	_____	_____	_____	_____
U016	_____	_____	_____	_____	_____
U018	_____	_____	_____	_____	_____
U019	_____	_____	_____	_____	_____
U022	_____	_____	_____	_____	_____
U029	_____	_____	_____	_____	_____
U031	_____	_____	_____	_____	_____
U036	_____	_____	_____	_____	_____
U037	_____	_____	_____	_____	_____
U041	_____	_____	_____	_____	_____
U043	_____	_____	_____	_____	_____
U044	_____	_____	_____	_____	_____
U046	_____	_____	_____	_____	_____
U050	_____	_____	_____	_____	_____
U051	_____	_____	_____	_____	_____
U053	_____	_____	_____	_____	_____
U061	_____	_____	_____	_____	_____
U063	_____	_____	_____	_____	_____
U064	_____	_____	_____	_____	_____
U066	_____	_____	_____	_____	_____
U067	_____	_____	_____	_____	_____
U074	_____	_____	_____	_____	_____
U077	_____	_____	_____	_____	_____
U078	_____	_____	_____	_____	_____
U086	_____	_____	_____	_____	_____
U089	_____	_____	_____	_____	_____
U103	_____	_____	_____	_____	_____
U105	_____	_____	_____	_____	_____
U108	_____	_____	_____	_____	_____
U115	_____	_____	_____	_____	_____
U122	_____	_____	_____	_____	_____
U124	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U129	_____	_____	_____	_____	_____
U130	_____	_____	_____	_____	_____
U133	_____	_____	_____	_____	_____
U134	_____	_____	_____	_____	_____
U137	_____	_____	_____	_____	_____
U151	_____	_____	_____	_____	_____
U154	_____	_____	_____	_____	_____
U155	_____	_____	_____	_____	_____
U157	_____	_____	_____	_____	_____
U158	_____	_____	_____	_____	_____
U159	_____	_____	_____	_____	_____
U171	_____	_____	_____	_____	_____
U177	_____	_____	_____	_____	_____
U180	_____	_____	_____	_____	_____
U185	_____	_____	_____	_____	_____
U188	_____	_____	_____	_____	_____
U192	_____	_____	_____	_____	_____
U200	_____	_____	_____	_____	_____
U209	_____	_____	_____	_____	_____
U210	_____	_____	_____	_____	_____
U211	_____	_____	_____	_____	_____
U219	_____	_____	_____	_____	_____
U220	_____	_____	_____	_____	_____
U221	_____	_____	_____	_____	_____
U223	_____	_____	_____	_____	_____
U226	_____	_____	_____	_____	_____
U227	_____	_____	_____	_____	_____
U228	_____	_____	_____	_____	_____
U237	_____	_____	_____	_____	_____
U238	_____	_____	_____	_____	_____
U248	_____	_____	_____	_____	_____
U249	_____	_____	_____	_____	_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION
GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
☐ Pharmaceutical wastewater containing
☒ spent methylene chloride
☐ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes ☐ No ☐ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes ☐ No ☐ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

_____ Yes _____ No _____ NA

If yes, check the appropriate treatability group.

_____ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
 _____ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

B. Waste Analysis

1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes _____ No _____ NA

How was this determination made?

- Knowledge of waste

☒ Yes _____ No

If yes, is any supporting data available for review? Describe how this is adequate. GC/MS analysis

- TCLP

_____ Yes ☒ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream:

decontamination water from monitoring activities

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

NA

2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes ☐ No ☒ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

☐ Yes ☐ No ☒ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

☐ Liquid hazardous waste having a pH less than or equal to 2

☐ Liquid hazardous waste containing metals

☐ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☐ Yes ☐ No ☒ NA

If yes, is any supporting data available for review? Describe how this is adequate. _____

- Testing _____ Yes _____ No ☒ NA

If yes, list test method used: _____

- d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

_____ Yes _____ No ☒ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No ☒ NA

3. First Third Wastes:

- a. Does the generator correctly determine the appropriate treatment standard of the waste?

_____ Yes _____ No ☒ NA

Note: The treatment standards for first third wastes are given in Appendix D.

- b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

_____ Yes _____ No _____ Soft hammer

If yes, specify the waste stream: _____

How was this determination made?

- Knowledge of waste

_____ Yes _____ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

☐ Yes ☐ No ☐ NA

- Total Constituent Analysis

☐ Yes ☐ No ☐ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

☐ Yes ☐ No ☐ NA

- d. How does the generator test the waste when a process or waste stream changes?

C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

☐ Yes ☒ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes ☐ No

- b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes ☐ No

c. Does notification contain the following?

EPA Hazardous waste number(s)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No ^B

Identify off-site treatment or storage facilities: ENSCO - El Dorado
Ardenne

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No

f. Does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site land disposal facilities: _____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

☐ Yes ☒ No ☐ NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

☐ Yes ☐ No

i. If yes, does the notification contain the following information?

EPA Hazardous waste number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
The corresponding treatment standards and all applicable prohibitions	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Date the waste is subject to the prohibitions	<input type="checkbox"/> Yes	<input type="checkbox"/> No

j. Does the generator retain copies of all notices and certifications for a period of 5 years?

☐ Yes ☒ No

some notifications missing manifest #15

D. Demonstration and Certification -- "Soft Hammer" Wastes

a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [263.3(a)(1)]?

☐ Yes ☐ No

b. Has the generator submitted to the Regional Administration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?

☐ Yes ☐ No

Addresses

☐ Yes ☐ No

Telephone Numbers

☐ Yes ☐ No

Contact dates

☐ Yes ☐ No

Attach a copy of the demonstration and certification

c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

☐ Yes ☐ No

If yes, attach a copy of written discussion.

- d. Does the generator ship his waste off-site for treatment?

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

- e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

_____ Yes _____ No

- f. Does the generator provide certification with each subsequent shipment of wastes?

_____ Yes _____ No

- g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number _____ Yes _____ No

(ii) Manifest number _____ Yes _____ No

(iii) Waste analysis data,
if available _____ Yes _____ No

- h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

_____ Yes _____ No

E. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ Yes _____ ☒ No

If yes, list types of waste treatment units and processes:

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

_____ Yes _____ No

If yes, check the appropriate regulatory status:

_____ Interim status for storage

_____ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: _____

- B. Does the transporter mix, combine, or recontainerize wastes?

_____ Yes _____ No

- C. Is the waste treated in an exempt treatment process on-site?

_____ Yes _____ No

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 263 requirements [264.13 or 265.13]?

o F-solvent ☐ Yes ☐ No ☐ NA
 o California List ☐ Yes ☐ No ☐ NA
 o First Third ☐ Yes ☐ No ☐ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☐ Yes ☐ No

- a. What date was the waste analysis plan last revised? _____

- b. Are analyses conducted on-site or off-site?

☐ On-site ☐ Off-site

Identify off-site lab: _____

- c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☐ No ☐ NA

- d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

☐ Yes ☐ No ☐ NA

Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

- e. Describe the frequency of sampling: _____

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

_____ Yes _____ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

_____ Yes _____ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

_____ Tanks
_____ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

_____ Yes _____ No _____ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

_____ Yes _____ No

5. Do operating records agree with container labeling?

_____ Yes _____ No _____ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

_____ Yes _____ No

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

_____ Yes _____ No _____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

_____ Yes _____ No

If yes, state how: _____

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

_____ Yes _____ No _____ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

_____ Yes _____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

_____ Yes _____ No _____ NA

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

_____ Yes _____ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

_____ Yes _____ No

4. Is dilution used as a substitute for treatment?

_____ Yes _____ No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

_____ Yes _____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets the treatment standards	_____ Yes	_____ No

Identify off-site disposal facilities: _____

3. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

_____ Yes _____ No

D. Treatment in Surface Impoundments

1. Are restricted wastes placed in surface impoundments for treatment?

_____ Yes _____ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

_____ Yes _____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____ Yes _____ No _____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

_____ Yes _____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

_____ Yes _____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

- a. If yes, are sludge and supernatant removed adequately on an annual basis?

_____ Yes _____ No

- b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

- c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

- d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

E. Land Disposal

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

_____ Yes _____ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

_____ Yes _____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

_____ Yes _____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

_____ Yes _____ No

If yes, at what frequency? _____

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

_____ Yes _____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

_____ Yes _____ No

7. Does the facility have notices [263.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [263.5], or no migration petitions [263.6]?

_____ Yes _____ No _____ NA

8. What is the volume of the restricted wastes disposed of to date?

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

_____ Yes _____ No _____ NA



State of Ohio Environmental Protection Agency

Northeast District Office

2110 E. Aurora Road
Twinsburg, Ohio 44087-1969
(216) 425-9171



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APR 26 1988

RECEIVED

Richard F. Celeste
Governor

April 15, 1988

G, TRS, PA

Arthur Kawatachi
Information Management Unit
Waste Management Division
U.S. EPA-Region V
230 South Dearborn Street
Chicago, Ill. 60690

Dear Mr. Kawatachi:

I am writing to provide you with information regarding a property at 23555 Euclid Ave., Cleveland, Ohio 44117. The facility was formerly known as the TRW, Inc. TAPCO facility, which is an interim status TSD facility (OHD 004-179-403). TRW, Inc. has moved the majority of their operations and has sold the property to Argo Tech, Inc., which has leased various portions of the facility to different companies. TRW, Inc. is currently undergoing closure of its interim status units, but continues to manage them according to 40 CFR Part 265 requirements.

At least two of the companies which have begun to operate at the former TAPCO facility have applied for hazardous waste identification numbers with your office and have been denied a number. Evidently, the use of a single mailing address for all of the companies operating at the property is problematic in that identification numbers assigned by your office are site specific. However, with the current situation at the facility, the use of a single hazardous waste identification number for all of the companies located at the property appears to be inadequate to properly track waste generation and transport from the site. In addition, I am concerned about the potential liability problems which might be encountered by the use of TRW, Inc.'s identification number by another company. I have informed the companies involved that it is the opinion of Ohio EPA that the use of TRW, Inc.'s identification number is not appropriate, and have instructed them to send new notification forms to your office along with explanatory letters. I have confirmed this opinion through telephone conversations with Rebecca Strom of U. S. EPA, who mentioned this matter to you.

From a conversation with Bruce Richardson of Argo Tech, Inc., I can provide you with a current tenant list at 23555 Euclid Ave. The companies on the list which are generators of hazardous waste are indicated with an asterisk. Please note that Airfoil Forging Textron has obtained an identification number form your office (OHD 981-534-399). The tenant list at the facility is as follows:

Mr. Arthur Kawatachi
April 15, 1988
Page -2-

*Argo Tech, Inc. ✓

*Airfoil Forging Textron OHD981534399

*Materials and Manufacturing Technology Center Textron MATLS & MFG Tech

*Precision Casting Corp.

V.M.E. Corp.

*TRW, Inc., (interim status, in closure)

Please note that all of these companies except Airfoil Forging Textron currently have no recourse but to use TRW, Inc.'s identification number in order to ship hazardous waste in compliance with 40 CFR Part 262. Ohio EPA requests your prompt action on the new hazardous waste notifications being submitted in order to help resolve this matter.

Please feel free to contact me regarding this matter should need arise.
Thank you.

Sincerely,



Paul Anderson
Environmental Scientist
Division of Solid and Hazardous Waste
Management

PA/sp

cc: Debby Berg, DSHWM, NEDO
Ed Lim, DSHWM, Central Office
Bruce Richardson, Argo Tech, Inc.
Andy Resetar, TRW, Inc.
Dr. Charles Barth, M & MTC

(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 265.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Date Issued April 12, 1983

Authorized Representative Thelma E. Rehinagle

TRW Inc.

Executive Offices
1900 Richmond Road
Cleveland, OH 44124

TRW

February 16, 1988

O. WMD
CC: RF
CERT #511071

Mr. Valdas V. Adamkus
Regional Administrator
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Adamkus:

Due to unforeseen, temporary, and uncontrollable circumstances hazardous waste must remain on TRW Inc.'s former 23555 Euclid Avenue, Cleveland, Ohio facility longer than 90 days. The intent of this letter is to request a 30-day extension to the 90-day period.

Thank you for your time and effort in this matter.

Sincerely,

Andrew L. Resetar

Andrew L. Resetar
Environmental Project Manager

cc: P. Anderson, Ohio EPA - Twinsburg
R. S. Ottinger
F. D. Trickey

ALR/th
18091

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FEB 23 1988
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

TRW Inc.

Station 5

Ohio EPA

Re: TRW, Inc.

OHAD004179453

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APR 04 1983

WASTE MANAGEMENT
BRANCH

March 10, 1983

Mr. Andrew Resetar
TRW, Incorporated
23555 Euclid Avenue
Cleveland, Ohio 44117

Dear Mr. Resetar:

On February 1, 1983, Chris Mikoy Frazier and I conducted an inspection of the TRW, Inc. facility located at 23555 Euclid Avenue, Cleveland, Ohio, to determine compliance with both State and Federal hazardous waste regulations. You represented TRW, Inc. during this inspection. A copy of the inspection report is enclosed.

The following problems were noted during this inspection:

1. A Waste Analysis Plan is needed which describes analytical parameters, test methods, sampling methods, and testing frequency for each waste stream generated by your facility and the final wastewater treatment sludge. Detailed chemical analyses are also needed for the D001, F006, and F008 wastes generated by your facility (40 CFR 265.13 and 3745-65-13).
2. The Inspection Plan should be amended to include daily inspections of loading and unloading areas when in use (40 CFR 265.15 and 3745-65-15).
3. The Contingency Plan needs additions including a list of emergency equipment with location, physical description and capabilities and an evacuation plan (40 CFR 265.51 and 3745-65-51).
4. The maximum inventory of hazardous wastes in storage and process and corresponding closure costs will need to be changed in the Closure Plan to coincide with revisions to be made in your Hazardous Waste Installation and Operation Permit (40 CFR 265.112 and 3745-66-12; 40 CFR 265.142).
5. Financial assurance for closure (40 CFR 265.143).
6. An Operating Record must be maintained which contains the description and quantity of each waste treated or stored within the facility, the dates and methods pertinent to such treatment or storage, and the present physical location within the facility (40 CFR 265.73 and 3745-65-73).

As discussed during the inspection, a revision of your Hazardous Waste Installation and Operation Permit is necessitated to remove wastes that are recycled by the facility or excluded from regulation via operation of a wastewater treatment unit. Permit application requests must include an amended Part A application

RCRA INTERIM STATUS INSPECTION FORM

Subpart D: Contingency and Emergency

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:				
a) Actions to be taken by personnel in the event of an emergency incident.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Arrangements or agreements with local or state emergency authorities.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) A list of all emergency equipment including location, physical description and outline of capabilities.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Fire plan to be built
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f))	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	being developed
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265.14(c))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. a) The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Section 265.17).				
a) Protection from sources of ignition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Physical separation of incompatible waste materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17 and 265.192(b) and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192(d). ✓
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192(c)). ✓
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194). ✓
4. Weekly inspections are made of all tank construction materials and containment structures (265.194). ✓
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (265.193(a))
 - a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record. ✓
 - b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record. ✓
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods: (265.198(a))
 - a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b). ✓

8/1/83 9:00 - 4:30
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB #

PART 1. GENERAL INFORMATION

U.S. EPA I.D. # OH0004179453

Facility: TRW Incorporated Address: 23535 Euclid Avenue City: Cleveland

State: Ohio Zip Code: 44117 County: Cuyahoga Telephone: (216) 692-5475

INSPECTION PARTICIPANTS(S)

(Name)	(Title)	(Telephone)
1. <u>Andrew Reseter</u>	<u>Design Engineer</u>	<u>(216) 692-5475</u>
2. _____	_____	_____
3. _____	_____	_____

INSPECTOR(S)	
1. <u>Robey Beals</u>	<u>(216) 425-9171</u>
2. <u>Chris Mikey-Frazier</u>	<u>(216) 425-9171</u>
3. _____	_____

INSTALLATION ACTIVITY

Mark One

If the site is a TSDF, check the boxes indicating which regulations are applicable.

<input type="checkbox"/> Generator only (G)	<input checked="" type="checkbox"/> General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure	<input type="checkbox"/> Waste Piles S03
<input type="checkbox"/> Transporter (T)	<input type="checkbox"/> Containers S01	<input type="checkbox"/> Land Treatment D81
<input type="checkbox"/> TSDF only	<input type="checkbox"/> Tanks S02/T01	<input type="checkbox"/> Landfills D80
<input type="checkbox"/> G-T	<input type="checkbox"/> Surface Impoundments S04/T02	<input type="checkbox"/> Chemical/Physical/Biological T04
<input checked="" type="checkbox"/> G-TSDF	<input type="checkbox"/> Incineration/Thermal Treatment	<input type="checkbox"/> Groundwater Monitoring
<input type="checkbox"/> T-TSDF		<input type="checkbox"/> Post-Closure
<input type="checkbox"/> G-T-TSDF		

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available.

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<u>✓</u>	<u> </u>	<u> </u>	<u> </u>

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

Yes	No	N/A	Remark #
-----	----	-----	----------

2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75.

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71)

a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b))

b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) are noted in writing on the manifest document. (265.71(a)(2))

4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director.

5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days.

Subpart G: Closure and Post-Closure

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112)

a) A description of how and when the facility will be closed. (265.112(a)(1)).

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

- | | Yes | No | N/A | Remark # |
|---|-------------------------------------|--------------------------|--------------------------|----------------|
| 1. Hazardous wastes are stored in containers which are: | | | | |
| a) Closed (265.173) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| b) In good physical condition (265.171) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| c) Compatible with the wastes stored in them (265.172) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <i>Comment</i> |
| 2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b)) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c)) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

* Lines used in drums with acid waste. The lines does not protect the top of the drum if the drum is tipped over. This is preventing looking for DOT approved drums that will hold this waste.

RCRA INTERIM STATUS INSPECTION FORM

NOTE : SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

Facility Name: TRW-TAPCO (Aircraft Components, Corp) Date of Inspection: 9-5-81
 Address: 23555 Euclid Ave EMTB #: 02-18-0653
Cleveland, OH 44117 USEPA ID #: OH 004 179 453
 County: Cuyahoga Facility Phone #: _____
 Facility Contact: Andy Resetar (216) 291-7859 Facility Contact Phone #: (216) 291-7859
 Inspector(s) Name(s): Paul Anderson Safety Equipment #: _____

STATUS

Cond. Ex. SQG ☒ SQG _____ Generator _____ Transporter _____ Treatment _____ Storage ☒ Disposal _____

ACTIVITIES

Containers ☒ Tanks _____ Surface Impoundments _____ Incineration/Thermal treatment _____
 Waste pile _____ Land treatment _____ Landfill _____ Groundwater monitoring _____
 Used oil burner _____ Hazardous waste fuel burner/blender _____

- | | <u>Y/N/NA</u> | <u>REMARK #</u> |
|---|---------------|-----------------|
| 1. Does the facility produce "discarded materials" as defined in 3745-51-02(A)? | <u>Y</u> | _____ |
| 2. Are they : | | |
| a. Abandoned (disposed; incinerated; accumulated, stored, or treated prior to disposal)? | <u>Y</u> | _____ |
| b. Recycled? | <u>N</u> | _____ |
| c. Inherently waste-like? (F020, F021, F022, F023, F026, F028)? | <u>N</u> | _____ |
| 3. If recycled or accumulated, treated or stored before recycling, is the waste: | | |
| a. Used in a manner constituting disposal? | <u>NA</u> | _____ |
| b. Burned for energy recovery? | <u> </u> | _____ |
| c. Reclaimed? (Refer to Table 1 of 3745-51-02) | <u> </u> | _____ |
| d. Accumulated speculatively? | <u> </u> | _____ |
| 4. Is the material recycled by being: | | |
| a. Used or reused as an ingredient in an industrial process to make a product without prior reclamation? | <u> </u> | _____ |
| b. Used as an effective substitute for commercial products? | <u> </u> | _____ |
| c. Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock? | <u>↓</u> | _____ |

	<u>Y</u> <u>N</u> <u>NA</u>	<u>REMARKS</u>
5. Are Land Disposal Restricted (LDR) wastes generated? If so, complete appropriate LDR checklist.	<u>Y</u>	
6. Has the facility submitted a Part A application to Ohio EPA in accordance with OAC 3745-50--07?	<u>Y</u>	
7. If yes, is it complete and accurate and does it contain all information specified in OAC 3745-50-41, -42, -43?	<u>Y</u>	
8. If not accurate, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51? If yes, what date was the PCR submitted.	<u>NA</u>	
9. Is the facility operating in compliance with the terms and conditions of its BWFB permit?	<u>Y</u>	
10. Has the facility submitted a Part B?	<u>N</u>	
11. Was advance notice of the inspection given? If so, how far in advance?	<u>Y</u>	<u>1 month</u>

REMARKS. GENERAL INFORMATION.

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

The TAPCO facility was operated by TRW for the production of aircraft and other weapons related components. The site was sold to Argo Tech in 1986, and has been inactive from TRW's point of view since that time. Argo Tech has leased several portions of the facility to other firms. All of the current firms operate on generators (490 day storage).

TRW was an interim status storage facility and is currently undergoing closure (final approval - August 1989) for two down storage areas and a spill area from the testing of torpedoes and associated underground tanks.

At the time of the inspection, there were no wastes (TRW's) on site.

Wastes are generated on an infrequent basis from decontamination of mine monitoring equipment.

Small Quantity Generator, Conditionally Exempt SQG

	<u>YES/NA</u>	<u>REMARKS</u>
1. Have the wastes generated at this facility been evaluated as required under 3745-62-11 (262.11)?	<u>Y</u>	
2. Does the generator produce <100 kg of waste per month? (conditionally exempt SQG)	<u>Y</u>	
3. Does the conditionally exempt SQG generate acutely hazardous waste in quantities exceeding those specified in 3745-61-05(E), 3745-61-05(F)	<u>N</u>	
4. Does the conditionally exempt SQG ensure delivery to an off-site permitted TSD?	<u>Y</u>	<u>Ensco in Eldorado Arkansas</u>
5. Do quantities of hazardous waste accumulated on-site at any one time exceed 1000 kg - or does the generator produce between 100 and 1000 kg of hazardous waste per month - (SQG)? If so, complete items 6-21.	<u>N</u>	<u>No waste in storage at time of inspection</u>
<u>SQG</u>		
6. Have the wastes generated at this facility been evaluated as required under 3745-62-11 (262.11)?	<u>NA</u>	
7. Do quantities of hazardous waste accumulated on-site ever exceed 6000 kg/s? (If so, TSD standards apply. Complete application TSD checklists.) [3745-62-34(D) and (F)] (262.34(d) and 262.34(f))	<u>1</u>	
8. If wastes are stored in containers, are wastes placed in containers in compliance with 3745-66-70 to 3745-66-77 except 3745-66-76? [3745-62-34(D)(2)] (262.34(d)(2) Complete <u>Management of Containers</u> checklist.	<u>1</u>	
9. If wastes are stored in tanks, are wastes stored in tanks in compliance with 3745-66-992? Complete <u>Accumulation in Tanks</u> for SQG's checklist.	<u>1</u>	

		<u>Y/N/NA</u>	<u>REMARKS</u>
10.	Is the date accumulation began clearly marked on each container? [3745-52-34(A)(2)] (262.34(a)(2))	NA	
11.	Is each container or tank clearly marked with the words "Hazardous Waste"? [3745-52-34(A)(3)] (262.34(a)(3))		
12.	Does the generator comply with the "Preparedness and Prevention" requirements for owners and operators of hazardous waste facilities? [3745-52-34(D)(4)] (262.34(d)(4)) Complete <u>Preparedness and Prevention</u> checklist.		
13.	Is an emergency coordinator available at all times? [3745-52-34(D)(5)(a)] (262.34)		
14.	Has the following information been posted by the telephone? [3745-52-34(D)(5)(b)] (262.34) a. Name and telephone number of emergency coordinator. b. Location of fire and spill control equipment. c. Telephone number of local fire department.		
15.	Have emergencies been reported to the National Response Center? [3745-52-34(D)(5)(d)] (262.34)		
16.	Has the generator accumulated hazardous wastes in excess of 180 days (or 270 days if the waste must be transported more than 200 miles)? [3745-52-34(E)] (262.34(e))		
17.	Has the generator been granted an extension by the Director/Regional Administrator for accumulation in excess of 180 days?		
18.	Have waste shipments been accompanied by a completed manifest? [3745-52-23] (262.23) If no, is the waste being reclaimed under a contractual agreement in accordance with OAC 3745-52-20(F) (262.20(F))?		
19.	Are signed copies of manifests retained for at least 3 years? [3745-52-40] (262.40)	Y	

Y/N/NA REMARKS

20. Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a USEPA identification number from the Administrator as required under 3745-52-12 (262.12)?
21. Are all employees thorough familiar with proper handling and emergency procedures? [3745-52-34(D)(4)(c)] (265.34(d)(4)(iii))

NA _____

✓ _____

Y/N/NA REMARK #

1. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by 3745-65-13(A)(1) (265.13(a))? Y
2. Does o/o have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. [3745-65-13(B)] (265.13(b)) Y
3. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1)) Y
 b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2)) Y
- IF BOTH 3A AND 3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.
4. Does the facility have - Y
 a. A 24-hour surveillance system, or maintained by Argo Tech
 b. An artificial or natural barrier and a means to control entry at all times [3745-65-14(B)(2)(a and b)] (265.14(b)(2)) Y
5. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. [3745-65-14(C)] (265.14(c)) Y
6. a. Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. [3745-65-15] (265.15) Y

Y/N/NA REMARKS

6. Are areas subject to spills (i.e., loading and unloading areas, etc.) inspected daily when in use and according to other applicable regulations when not in use. [3745-65-16(B)(4)] (265.15(b)(4))
7. Has the o/o provided a Personnel Training Program in compliance with 3745-65-16(A)(3)(C) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course? (265.16(a)(b)(c))
8. Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records? (265.16(d)(e))
9. If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17] (265.17)
- a. Protection from sources of ignition.
 - b. Physical separation of incompatible waste materials.
 - c. "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.
 - d. Comingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) (265.17(b))

Y _____

Y _____

Y _____

<u>NA</u>	<u>No waste</u>
<u>NA</u>	<u>currently on</u>
<u>NA</u>	<u>storage</u>
<u>NA</u>	_____
<u>NA</u>	_____

240 3745-65 PREPAREDNESS AND PREVENTION - 20 CFR PART 265 SUBPART D

		<u>Y/N/NA</u>	<u>REMARKS</u>
1.	Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] (265.31)	<u>Y</u>	
2.	Has there been a fire, explosion or non-planned release of waste at the facility? a. If yes, has the contingency plan been implemented?	<u>N</u> <u>NA</u>	
3.	If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(3)(C)(D)] (265.32)	<u>Y</u>	
	a. Internal alarm system?	<u>Y</u>	
	b. Access to telephone, radio or other device for summoning emergency assistance?	<u>Y</u>	
	c. Portable fire control equipment?	<u>Y</u>	
	d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	<u>Y</u>	
4.	Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary? [3745-65-33] (265.33)	<u>NA</u>	<i>no waste in storage - see waste log</i>
5.	If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34)	<u>NA</u>	<i>see above</i>
6.	If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] (265.35)	<u>NA</u>	<i>see above</i>
7.	If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards and the facility layout? [3745-65-37(A)] (265.37(a))	<u>NA</u>	<i>see above</i>

MINIMA REMARK

5. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3743-65-37(B)] (265.37(B))

NA _____

3745-65 CONTINGENCY PLAN AND EMERGENCY PROCEDURES (40 CFR PART 265 SUBPART D)

Y/N/NA REMARK #

1. Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? [3745-65-52(A)(B)(C)(D)(E)] (265.52):
 - a. Actions to be taken by personnel in the event of an emergency incident? Y _____
 - b. Arrangements or agreements with local or state emergency authorities? Y _____
 - c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? Y _____
 - d. A list of all emergency equipment including location, physical description and outline of capabilities? Y _____
 - e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)] (265.52(f))? Y _____
2. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] (265.53) Y sent to local authorities in 1996
3. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] (265.54) NA no need to revise plan since facility is not generating waste.
4. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] (265.56) Y since Richardson made first of RCRA Tech
5. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications deemed necessary under 3745-65-56(A-J). (265.56(a-j)) NA _____

3745-65 MANIFEST SYSTEM RECORDS REPORTING 40 CFR PART 265, SUBPART B

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

Y/N/NA REMARK #

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) (265.73) which contains the following information:

- | | | | |
|----|--|-----------|-----------------|
| a. | Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(3)(1)] (265.73(b)(1)). | <u>Y</u> | <u> </u> |
| b. | Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste? | <u>Y</u> | <u> </u> |
| c. | The estimated (or actual) weight, volume or density of the waste material? | <u>Y</u> | <u> </u> |
| d. | A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745? (Part 265, Appendix I, Table 2) | <u>Y</u> | <u> </u> |
| e. | The present physical location of each hazardous waste within the facility? | <u>NA</u> | <u> </u> |
| f. | Records of incidents which require implementation of the Contingency Plan? | <u>NA</u> | <u> </u> |
| 3. | FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document numbers? [3745-65-73(3)(2)] (265.73(b)(2)) | <u>NA</u> | <u> </u> |
| h. | Records of any waste analyses and trial tests required to be performed? | <u>NA</u> | <u> </u> |
| i. | Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)? | <u>NA</u> | <u> </u> |
| j. | Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6); (265.73(b)(6))? | <u>NA</u> | <u> </u> |

- k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required under CAC 3745-66 (Part 265 Subpart G)?
2. Has the o/o submitted an annual (biennial) Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under 3745-65-75 (265.75)?
- NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.
3. Are manifests received by the facility signed and dated?
Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years?
[3745-65-71(A)] (265.71)
- a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)] (265.71(b))?
- b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) (265.72(a)) noted in writing on the manifest document.
4. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) (265.72(b)) or has the o/o submitted the required information to the Director/Regional Administrator?
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) (265.76) been submitted to the Director/Regional Administrator within 15 days?

NA

Y

NA

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3745-66 CLOSURE AND POST-CLOSURE 40 CFR PART 265. SUBPART D

	Y/N/NA	REMARK #
1. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] (265.112)?	<u>Y</u>	<u>Plan approved closure being implemented</u>
a. A description of how each hazardous waste management unit will be closed in accordance with 265.111.	<u>Y</u>	<u> </u>
b. A description of how final closure will meet the requirements of 3745-66-11 (265.111).	<u>Y</u>	<u> </u>
c. An estimate of the maximum amount of hazardous waste ever in inventory.	<u>Y</u>	<u> </u>
d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues.	<u>Y</u>	<u> </u>
e. The year closure is expected to begin and a schedule for the various phases of closure.	<u>Y</u>	<u> </u>
f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control.	<u>Y</u>	<u> </u>
2. Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)] (265.112(C))	<u>NA</u>	<u> </u>
3. Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director/Regional Administrator 180 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))	<u>NA</u>	<u> </u>
4. Has the closure plan (and post-closure plan, if applicable) for tank, containers storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))	<u>Y</u>	<u> </u>

- | | | <u>NA</u> | <u>READY</u> |
|-----|---|-------------------|---------------------------|
| 5. | Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)] (265.113(a)) | <u>NA</u> | <u>Closure in process</u> |
| 6. | Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)] (265.113(b)) | <u>NA</u> | <u>See above</u> |
| 7. | Did the owner/operator submit to the Director/Regional Administrator, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] (265.115) | <u>NA</u> | <u>See above</u> |
| 8. | Did the owner/operator submit to the local zoning authority and the Director/Regional Administrator a survey plan in accordance with OAC 3745-66-16? | <u>NA</u> | <u> </u> |
| 9. | What permitted units at the facility have been closed in accordance with an approved Closure Plan? | <u> </u> | <u> </u> |
| 10. | If closure was partial, list the regulated units which remain in use at the facility:

_____ | | |
| 11. | If required, has the facility prepared a written post-closure plan? [3745-66-18] (265.113) | <u>NA</u> | <u> </u> |
| 12. | Does the post-closure plan include: | | |
| a. | A description of proposed ground water monitoring? | <u>NA</u> | <u> </u> |
| b. | A description of planned maintenance activities? | <u>1</u> | <u> </u> |
| c. | The name, address and phone number of person/office to contact during the post-closure period? | <u>V</u> | <u> </u> |

YES NA REMARK

13. For disposal facilities, has the owner/operator submitted to local land authorities and the Director a survey plan within 60 days after certification of closure? [3745-66-19] (265.119) NA _____

14. Has the owner of the property on which a disposal unit is located recorded on the deed that:

- a. The land has been used to manage hazardous waste and the type, quantity and location of waste? NA _____
- b. Land use is restricted pursuant to 3745-66-17? SV _____
[3745-66-19] (265.119)

3745-66 USE AND MANAGEMENT OF CONTAINERS (40 CFR PART 265, SUBPART D)

		<u>Y/N/NA</u>	<u>REMARK #</u>
1.	Are hazardous wastes stored in containers which are:		
a.	Closed [3745-66-73(A)] (265.173)?	<u>NA</u>	<u>No containers on site at time of inspection</u>
b.	In good condition [3745-66-71] (265.171)?		
c.	Compatible with the wastes stored in them [3745-66-72] (265.172)?		
2.	Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] (265.173(a))		
3.	Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] (265.173(b))		
4.	Is the area where containers stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] (265.174) [documentation of inspections required under 3745-65-15 for TSDs]		
5.	Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] (265.176)		
6.	Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] (265.177(c))	<u>✓</u>	